

Resp. to NCM
(25?)

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120 LONG RIDGE ROAD, P.O. BOX 1355, STAMFORD, CT 06904-1355

ARTHUR D. RHEINGOLD
Senior Counsel Environmental
Phone: (203) 356-2411
Fax: (203) 356-2011

August 29, 1989

VIA FEDERAL EXPRESS

Lynne A. Fratus
U.S. Environmental Protection Agency
90 Canal Street
Boston, MA 02203

Superfund Records Center

SITE: LA RP

BREAK: 11.9

OTHER: 639802

PHILIP A. HUNT CHEMICAL CORP

RE: The Landfill & Resource Recovery Site
in North Smithfield, Rhode Island

Dear Ms. Fratus:

I am writing in response to your July 3, 1989 request for additional information concerning Philip A. Hunt Chemical Corporation's involvement with the Landfill & Resource Recovery Site. In that request, you asked for documentation concerning the company's financial and corporate status. In a conversation with Cynthia Barry, my paralegal, Mary Borg extended to August 31, 1989 our time to respond.

Olin Corporation ("Olin") purchased 63.4% of the shares of common stock of Philip A. Hunt Chemical Corporation ("Hunt") on March 1, 1983. On July 5, 1984, Olin acquired the remaining 36.6% of Hunt. Hunt is now a wholly-owned subsidiary of Olin known as Olin Hunt Specialty Products Inc. ("Olin Hunt").

Olin is one of the world's largest manufacturers and distributors of chemicals. In 1988, Olin employed approximately 16,400 people in various facilities throughout the world. Sales during that year exceeded \$2.3 billion. The 10-K forms submitted with this letter show that Olin will be capable of meeting any financial obligation which may arise out of the proposed remediation of the Landfill & Resource Recovery Site.

In these circumstances, your request for financial statements for the past five fiscal years, as well as lists of all insurance policies held since 1976 and all current assets and liabilities is burdensome. Such information and documentation is voluminous and would take Olin many weeks to assemble and duplicate. It would not appear to be more useful than the information contained in the 10-K's, which are supplied for the previous five years. The material would have no relevance to the Landfill and Resource Recovery Site and would lead to no relevant evidence. The form distributed by you appears to be a standardized



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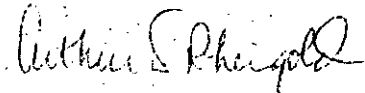
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O L I N C O R P O R A T I O N

request for information and not specifically tailored to companies such as Olin. Accordingly, we have provided you with information and documentation in a somewhat different form from that requested.

We trust that this response will be sufficient for your purposes. If you have any questions, please do not hesitate to call.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Arthur D. Rheingold".

Arthur D. Rheingold

RESPONSE OF OLIN CORPORATION TO EPA
REQUEST FOR ADDITIONAL INFORMATION
DATED JULY 3, 1989

This information is submitted in response to the United States Environmental Protection Agency's ("EPA") request for additional information, dated July 3, 1989, concerning Philip A. Hunt Chemical Corporation's involvement with the Landfill & Resource Recovery Site. By submitting this response, Olin Corporation does not waive any right that it may have to object to this request for information.

FINANCIAL/CORPORATE INFORMATION

QUESTION 4a

Please state the correct legal name of your company, agency or business. Provide the name and address of the current president and chairman of the board of directors of your company. Additionally, please state any other names by which your company has been known.

ANSWER 4a

Olin Corporation ("Olin") purchased 63.4% of Philip A. Hunt Chemical Corporation ("Hunt") on March 1, 1983. On July 5, 1984, Olin acquired the remaining 36.6% of Hunt. Hunt is now a wholly-owned subsidiary of Olin known as Olin Hunt Specialty Products, Inc. ("Olin Hunt").

Correct Legal Name: Olin Hunt Specialty Products Inc.

Chairman: John W. Johnstone, Jr.
Olin Corporation
120 Long Ridge Road
Stamford, Connecticut 06904

President Edward B. Pollak
& C.E.O.: Olin Corporation
120 Long Ridge Road
Stamford, Connecticut 06904

Other Corporate Names: Philip A. Hunt Company;
Philip A. Hunt Chemical Corporation

QUESTION 4b

If the company is or was a subsidiary of another corporation, identify such other corporation and state the dates during which the parent/subsidiary relationship existed and the name and address of that corporation president and chairman of the board and other officers.

ANSWER 4b

Olin Hunt has been a wholly-owned subsidiary of Olin since July 1984.

Chairman: John W. Johnstone, Jr.
Olin Corporation
120 Long Ridge Road
Stamford, Connecticut 06904

President and Chief Executive Officer:	Edward B. Pollak Olin Corporation 120 Long Ridge Road Stamford, Connecticut 06904
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Vice President, Finance:	Robert J. Smith Olin Corporation 120 Long Ridge Road Stamford, Connecticut 06904
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Vice President, General Counsel and Assistant Secretary	James S. Fraser Olin Corporation 120 Long Ridge Road Stamford, Connecticut 06904
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Treasurer:	C. Robert Tully Olin Corporation 120 Long Ridge Road Stamford, Connecticut 06904
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Secretary:	Melvin Neisloss Olin Corporation 120 Long Ridge Road Stamford, Connecticut 06904
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Assistant Treasurer:	Janet M. Pierpont Olin Corporation 120 Long Ridge Road Stamford, Connecticut 06904
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Assistant Treasurer:	George B. Erensen Olin Corporation 120 Long Ridge Road Stamford, Connecticut 06904
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Assistant Secretary	Paul Weinstein Olin Corporation Chemicals R & D 350 Knotter Drive Cheshire, Connecticut 06410
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QUESTION 4c

Identify the state of incorporation, agent for service, and the EPA identification number of all companies identified in response to Question 2a and b above.

ANSWER 4c

Olin

State of Incorporation: Virginia
Agent for Service: G.R.C. Stuart
c/o Penn, Stuart, Eskridge & Jones
Abington, Virginia 24210

Olin Hunt

State of Incorporation: Delaware
Agent for Service: The Corporation Trust Company
Corporation Trust Center
1209 Orange Street
Wilmington, Delaware 19801
RID 001202589

QUESTION 4d

Please state the nature of your company's business, and briefly describe its operation at each location.

ANSWER 4d

Olin develops, manufactures and markets industrial chemicals, performance chemicals and water treatment products and services. Olin Hunt manufactures and markets image-forming and related specialty chemicals.

Olin has plants at 41 separate locations in 23 states and 8 plants in 8 foreign countries. Listed below are the locations of Olin's plants in the United States and the principal products manufactured at each plant.

Chemicals

Augusta, GA	Chlorine, caustic soda, hydrochloric acid, sodium hypochlorite, sodium hydrosulfite
Beaumont, TX	Sulfuric acid, mix of ammonium sulfite-bisulfite
Berea, OH	Dry toners and developers

Brandenburg, KY	Ethylene oxide, industrial glycols, glycol ethers, surfactants, polyols, functional fluids
Brook Park, OH	Urethane foam systems
Charleston, TN	Chlorine, caustic soda, sodium hypochlorite, sodium hydrosulfite, calcium hypochlorite
East Providence, RI	Formulation and packaging of photoresists
Independence, OH	Pool purification equipment
Joliet, IL	Industrial phosphates, high grade fertilizer, sodium fluorides
Kansas City, KS	Formulated water treatment chemicals
Lake Charles, LA	Ammonia, nitric acid, hydrazine and hydrazine propellants, hydrogen chloride, toluene diisocyanate, chlorinated phosphate ester additive, chloroisocyanurates
Livonia, MI	Chloroisocyanurate packaging
McIntosh, AL	Chlorine, caustic soda, hydrogen, hydrazine propellant blending and storage
Nazareth, PA	High-purity acids
Niagara Falls, NY	Chlorine, caustic soda, hydrogen, potassium hydroxide, sodium chlorite, sodium methylate, sodium hypochlorite
Ontario, CA	Conductive inks and coatings
Palisades Park, NJ	Filming agents, liquid toners and plating chemicals
Rochester, NY	Specialty chemicals and intermediates, biocides
Rolling Meadows, IL	Photographic chemical systems
Seward, IL	Electronic chemicals and delivery systems
Shreveport, LA	Sulfuric acid
South Charleston, WV	Chloroisocyanurates, cyanuric acid
Tempe, AZ	Specialty etchants

Metal and Materials

Bloomington, IL	Stamped metal products, fabricated parts, shaped charge copper cones
Bryan, OH	Copper and copper alloy re-rolling
Cuba, MO	Copper alloy welded tube
East Alton, IL	Copper and copper alloy sheet and strip, fabricated parts, composite metal strip for coins, specialty metal products
Indianapolis, IN	Copper and copper alloy strip, rod and seamless tube
Manteca, CA	Assembly of integrated circuits and microelectronic packages
Mountainview, CA	Tape automated bonding materials
New Bedford, MA	Packages for hybrid integrated circuits
Waterbury, CT	Copper foil, thin-gauge copper alloys and stainless steel, custom conversion rolling

Defense and Ammunition

East Alton, IL	Sporting and defense ammunition, industrial cartridges
Lancaster, PA	Mechanical and electronic fuzes
Marion, IL	Defense ammunition, jet engine starter cartridges, missile auxiliary power gas generators
Moses Lake, WA	Solid propellants, gas generators
Red Lion, PA	Large caliber ordnance components
Redmond, WA	Rocket engines, gas generators, electronic subsystems for aircraft and ships
St. Marks, FL	Smokeless Ball Powder propellant, combustible cartridge cases
San Leandro, CA	Pulsed power equipment and services, radiation simulators, ordnance components
Wadsworth, OH	Ordnance components

In addition, Olin leases warehouses, terminals and distribution offices and space for executive and branch sales offices and service departments throughout the country.

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QUESTION 4e

State every location at which your company has operated and the dates of operation at each location.

ANSWER 4e

The facility from which wastes were taken to the Landfill and Resource Recovery Site was the Saylesville Division. Its dates of operation were from 1962 to its closing on June 30, 1988. Its address was Industrial Circle, Lincoln, Rhode Island 02865.

QUESTION 4f

Identify all liability insurance policies held by Respondent from 1976 to present. In identifying such policies, state:

1. the name and address of each insurer and of the insured;
2. the amount of coverage under each policy;
3. the commencement and expiration dates for each policy;
4. whether or not the policy contains a "pollution exclusion" clause; and
5. whether or not the policy covers sudden, non-sudden or both types of accidents.

In lieu of providing this information, you may submit complete copies of all insurance policies that may cover the release or threatened release of hazardous materials.

ANSWER 4f

Hunt maintained a series of liability insurance programs over the years which may provide coverage for any liability at the Landfill & Resource Recovery Site. Each such successive insurance program involved a primary and a number of excess coverage layers. Olin Hunt has notified its insurance carriers of EPA's claim for the Landfill and Resource Recovery Site.

The Landfill and Resource Recovery Site is one of a number of similar claims of which Olin Hunt has notified its insurance carriers. These claims are the subject of negotiations among Olin Hunt and its insurance carriers. In view of the delicate nature of these negotiations, Olin's desire to maintain the confidentiality of this information, and the lack of materiality any recovery for the Landfill and Resource Recovery Site would have with respect to the financial situation of Olin, Olin respectfully declines to respond to this request.

QUESTION 4g

Provide copies of all income tax returns sent to the Federal Internal Revenue Service in the last five years.

ANSWER 4g

Copies of Olin's Form 10-K Annual Report submitted to the Securities and Exchange Commission for the years 1984-1988 are attached as Exhibit A.

QUESTION 4h

Provide all financial statements for the past five fiscal years, including but not limited to those filed with the federal and state Internal Revenue Service and Securities and Exchange Commission.

ANSWER 4h

See Exhibit A.

QUESTION 4i

Identify all of Respondent's current assets and liabilities and the person(s) who currently own or are responsible for such assets and liabilities.

ANSWER 4i

See Exhibit A.

QUESTION 4j

Identify all subsidiaries and parent corporations of Respondent.

ANSWER 4j

Olin Hunt Specialty Products Inc. has no subsidiaries. Its parent corporation is Olin Corporation.

QUESTION 4k

Provide a copy of the most current Articles of Incorporation and By-Laws of Respondent.

ANSWER 4k

Copies of Olin's and Olin Hunt's most current Articles of Incorporation and By-Laws are attached as Exhibit B.

QUESTION 4l

Identify the managers and majority shareholders of Respondent and the nature of their management duties or amount of shares held, respectively.

ANSWER 4l

See Exhibit A.

CERTIFICATION OF ANSWERS TO REQUEST
FOR INFORMATION

State of Connecticut

County of Fairfield

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that my Company is under a continuing obligation to supplement its response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or the Company's response thereto should become known or available to the Company.

Arthur D. Rheingold

NAME (print or type)

Senior Counsel - Environmental

TITLE (print of type)

Arthur D. Rheingold

SIGNATURE

Sworn to before me this
29th day of August, 1989

Susan H. Shead

Notary Public

SUSAN H. SHEAD
NOTARY PUBLIC
MY COMMISSION EXPIRES MARCH 31, 1994